

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY
Albert Russo CN 4853 Trenton, NJ 08650 (609) 587-6888 Standing Chapter 13 Trustee
In re: Barry Nolan Debtor(s)

Case No. 19-27257 / MBK

Hearing Date: January 8, 2020 10:00 am

Judge: Michael B. Kaplan

Chapter: 13

TRUSTEE'S OBJECTION TO DEBTOR(S) CHAPTER 13 PLAN

Albert Russo, Standing Chapter 13 Trustee, objects to the Debtor(s) Plan for the following reason(s):

The debtor(s) plan consists of unnecessary or excessive expense items, such as: Sch J has RV monthly payment of \$506 ,RV insurance \$75 and Trailer monthly payment \$190. Also appear to have liens on 2 dirt bikes as creditor, Freedom Financial is listed in plan as current on the bikes. No monthly amounts on J for these bikes and Trustee objects to paying these monthly amounts absent 100% dividend to unsecured creditors. -life insurance \$358 and car payment \$673.

The debtor(s) is not paying all disposable income into the plan pursuant to either Schedules I & J or Form 22C based upon the Trustee's review of the income and tax returns provided. The Trustee's calculations are higher for the following reason(s): Income verified higher(\$9,314.85) than scheduled (\$7,872.77).

-must file pre conf cert.

-explanation regarding the \$50,000 in accounts receivable listed on the petition

WHEREFORE, Standing Chapter 13 Trustee, Albert Russo, objects to confirmation of the plan.

/s/ Albert Russo

Albert Russo

Standing Chapter 13 Trustee

by: Erik Collazo, Staff Attorney